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June 12, 2019

**VIA ECF AND ELECTRONIC MAIL**

Honorable Shelley C. Chapman  
United States Bankruptcy Judge  
Southern District of New York  
One Bowling Green  
New York, NY 10004  
[scc.chambers@nysb.uscourts.gov](mailto:scc.chambers@nysb.uscourts.gov)

Re: *Gil-White v. Ercil, et al.*, Adv. No. 19-01294 (*In re Perforadora Oro Negro, et al.*) (Bankr. S.D.N.Y.)

Dear Judge Chapman:

We write on behalf of the Plaintiff in the above-referenced matter requesting a correction to the docket in Adv. Proc. No. 19-01294.

We respectfully request that the Court block the previously filed docket entries for the Complaint (the “Original Complaint”) [Adv. Proc. ECF 1] [Main Proc. ECF 203], dated June 6, 2019, and allow Mr. Gil to file in its place the corrected Complaint, attached as Exhibit 1 (the “Corrected Filing”).

The Original Complaint inadvertently omitted a redaction. Specifically, one sentence in paragraph 70 of the Complaint should have been redacted pursuant to the Protective Order [ECF 167] between the Seadrill Limited (“Seadrill”), Fintech Advisory, Inc. (“Fintech”) and the Debtors. The proposed Corrected Filing makes no changes to the Original Complaint other than adding the identified redaction.

Counsel for Fintech alerted counsel to Mr. Gil to the error on June 9, 2019. Counsel for Mr. Gil conferred with Counsel for Fintech from June 10 to June 11, 2019. Counsel for Fintech confirmed on June 12, 2019 that it had no further comments with regard to redactions in the Original Complaint.

Mr. Gil respectfully requests that this correction be allowed without prejudice to his right to amend the Complaint at a later date in accordance with Rule 15(a)(1) of the Federal Rules of Civil Procedure, made applicable to this proceeding through Bankruptcy Rule 7015.

No party has yet been served with the Original Complaint in this matter, and the correction to the docket is not sought for any improper purpose. Accordingly, we respectfully request the Court allow the proposed correction, while reserving all rights to challenge the designation of the redacted material.

Respectfully submitted,



Gabriel F. Soledad

**quinn emanuel urquhart & sullivan, llp**

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